

1/1106/21 / 21-024(c,i) and 21-027(a)



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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 29, 1997

Mr. G. Thomas Todd, Area Manager
Los Alamos Area Office
Department of Energy
528 35th Street
Los Alamos, New Mexico 87544

Dr. Sigfried Hecker, Director
Los Alamos National Laboratory
P. O. Box 1663, MS A100
Los Alamos, New Mexico 87545

RE: Request for Supplemental Information
Phase II Sampling and Analysis Plans
21-024(c, i) and 21-027(a)
Los Alamos National Laboratory
NM0890010515

Dear Mr. Todd and Dr. Hecker:

The Resource Conservation and Recovery Act Permits Management Program (RPMP) of the Hazardous and Radioactive Materials Bureau (HRMB) has reviewed the Phase II Sampling and Analysis Plans (LAUR-95-4257 thru 95-4259) for potential release sites 21-024(c, i) and 21-027(a) dated January 1996 and referenced by EM/ER:96-033 and found them to be insufficient. The NMED Department of Energy (DOE) Oversight Bureau and the US Environmental Protection Agency (EPA) provided technical comments which were considered in staff review. LANL must respond to the request for supplemental information noted in Attachment A within thirty (30) calendar days of the receipt of this letter. If DOE/LANL does not submit a complete response to the request for supplemental information or submit the information within thirty (30) calendar days a Notice of Deficiency will then be issued.

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Mr. Todd and Dr. Hecker
July 29, 1997
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Should you have any questions regarding this letter, please contact me or Mr. John Kieling, HRMB's LANL Facility Manager, at (505) 827-1558.

Sincerely,


Robert S. (Stu) Dinwiddie, Ph.D., Manager
RCRA Permits Management Program
Hazardous and Radioactive Materials Bureau

RSD:kth

attachment

cc w/ attachments: T. Baca, LANL EM-DO, MS J591
T. Davis, NMED HRMB
B. Garcia, NMED HRMB
T. Glatzmaier, LANL DDEES/ER, MS M992
K. Hill, NMED HRMB
J. Jansen, LANL EM/ER, MS M992
M. Johansen, DOE LAAO, MS A316
J. Kieling, NMED HRMB
M. Leavitt, NMED GWQB
H. LeDoux, DOE LAAO, MS A316
D. McInroy, LANL EM/ER, MS M992
D. Neleigh, EPA, 6PD-N
J. Parker, NMED DOE OB
S. Pierce, NMED SWQB
G. Saums, NMED SWQB
T. Taylor, DOE LAAO, MS A316
S. Yanicak, NMED DOE OB, MS J993
File: Reading and LANL HSWA 1/1106/21/21-024(c, i) & 21-027(a)
Track: LANL, doc date, NA, DOE/LANL, HRMB/kth, RE, file

ATTACHMENT A
Request for Supplemental Information
Phase II Sampling and Analysis Plans
21-024(c, i) and 21-027(a)
January 1996

GENERAL COMMENTS

1. LANL continues to refer to other workplans, reports, and voluntary corrective action plans for information pertinent to the document being reviewed. If information presented in a previous document is pertinent to the approach being taken in the document being reviewed then LANL needs to repeat and provide the necessary information rather than citing another document. All reports and sampling plans should be complete documents, and the reviewer should not be required to find numerous other documents to complete a review and make a decision on the information being presented. Note: The Voluntary Corrective Action Plan listed (LANL 1995, 01-018) has not been reviewed, and the approach from this document (PRS 21-024(c)) cited on page 5, last paragraph has not been approved.
2. LANL needs to provide the detection limits for the field screening devices being used, in particular for the XRF.
3. Data is being collected for the possible recreational risk assessment and not for an eco-risk assessment which may need to be addressed at a later date.
4. When collecting the exterior samples, LANL should ensure that a sample is collected beneath where the piping enters and exits the septic tank.
5. LANL shall provide a schedule for field activities and RFI Report submittals.
6. Please clarify why LANL indicates proposed Phase II sampling locations on associated figures if sampling locations will be biased using field screening techniques.
7. LANL must not consider the soil-tuff interface as a contaminant boundary. In other words, LANL must sample below the soil-tuff interface if it occurs above the planned or recommended sampling intervals.

SPECIFIC COMMENTS: 21-024(c) Septic Tank and Outfall

1. **Figure 2, p. 3:** The correlation between the 20-foot grid and the proposed Phase II sampling locations is unclear. Please clarify if this is related to the approach described in LANL 1995, 01-018.

2. **3.4.1 Outfall Area, p. 7:** LANL must obtain additional samples at depth at the outfall location, 21-1391, since surficial contamination has already been identified. Two additional samples must be taken at the 2-foot and 4-foot depth.
3. Since contamination was found at the outfall, LANL must also investigate the piping associated with the septic tank for leakage.
4. LANL must include analyses for mercury and polychlorinated biphenols in the Phase II sampling since it was "inadvertently omitted" from the Phase I investigation.
5. LANL must submit samples for laboratory analysis obtained from hot spots identified using XRF and radiological field screening techniques in order to determine if radiological constituents and inorganic compounds are potentially co-located.
6. LANL shall also conduct field screening for volatile organic compounds.
7. LANL must ensure the integrity of volatile organic compound samples from both the interior and exterior of the septic tank.
8. Of the four borings LANL intends to take on the exterior of the septic tank, two shall be located beneath the entrance and exit pipes.

SPECIFIC COMMENTS: 21-024(i) Septic Tank and Outfall

1. LANL must obtain additional deeper samples at the three sampling locations (21-1395, 21-1396 and 21-1397) where arsenic was identified above SALs. Two additional samples must be taken at the 2-foot and 4-foot depth.
2. LANL must submit samples for laboratory analysis obtained from hot spots identified using XRF and radiological field screening techniques in order to determine if radiological constituents and inorganic compounds are potentially co-located.
3. LANL shall also conduct field screening for volatile organic compounds.
4. LANL must ensure the integrity of volatile organic compound samples from both the interior and exterior of the septic tank.

5. Of the four borings LANL intends to take on the exterior of the septic tank, two shall be located beneath the entrance and exit pipes.
6. Depending on the outcome of the Phase II sampling at the outfall and septic tank areas, additional investigation of the associated piping may also need to be investigated.

SPECIFIC COMMENTS: 21-027(a) Surface Drainage System

1. **3.3 Field Screening, p. 8:** LANL shall describe the chromium field screening technique.
2. Depending on the outcome of the Phase II sampling at the outfall and septic tank areas, additional investigation of the associated piping may also need to be investigated.
3. LANL must obtain deeper samples (at a depth of 2 feet) at the following locations: 21-1365, 21-1366, 21-1368, 21-1370, 21-1371, and 21-1369. Additional samples must be obtained at the 2-foot and 4-foot interval for sample location 21-1365.